

HEATHER E. WILLIAMS, #122664
Federal Defender
RACHELLE BARBOUR, #185395
Assistant Federal Defender
OFFICE OF THE FEDERAL DEFENDER
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: 916-498-5700/Fax: 916-498-5710

Attorney for Defendant
XAVIER ROBERTS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No: 2:24-CR-0309-WBS
)	
Plaintiff,)	
)	STIPULATION AND ORDER TO CONTINUE
vs.)	STATUS CONFERENCE AND EXCLUDE
)	TIME
XAVIER ROBERTS,)	
)	District Judge William B. Shubb
Defendant.)	New Date: December 8, 2025
)	Time: 10:00 a.m.
)	

IT IS HEREBY STIPULATED and requested by and between the parties through their respective counsel, HEIKO COPPOLA, Assistant United States Attorney, attorney for the UNITED STATES, and RACHELLE BARBOUR, attorney for Defendant XAVIER ROBERTS, that the status conference currently set for Monday, October 27, 2025, be continued to Monday, **December 8, 2025, at 10:00 a.m.**, and that time be excluded for preparation of counsel.

The Government has provided hundreds of documents and dozens of video files for Defense counsel's review in this case. Since the start of the case, Defense counsel has been reviewing and analyzing the above, conducting legal research, meeting with her client, and otherwise preparing for trial. The above tasks are ongoing, and the defense requires additional time to review discovery, discuss the case with her client and the Government, conduct further research in support of a plea resolution, and continue to prepare.

The parties expect to finalize a plea agreement in the additional time requested and provide it to the Court for its review in anticipation of a change of plea at the next hearing. The

parties believe that failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. Mr. Roberts is out of custody in this matter in full compliance with all the terms of his pretrial release.

Accordingly, the parties stipulate and request that the Court exclude time between the date of the filing of this stipulation through the new status conference date of December 8, 2025, under 18 U.S.C. § 3161(h)(7)(A), (B)(iv) (Local Code T4). The parties agree that the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendant in a trial within the original date prescribed by the Speedy Trial Act.

Date: October 22, 2025

HEATHER E. WILLIAMS
Federal Defender

/s/ Rachelle Barbour
RACHELLE BARBOUR
Attorney for Defendant
XAVIER ROBERTS

Date: October 22, 2025


ERIC GRANT
United States Attorney

/s/ Heiko Coppola
HEIKO COPPOLA
Assistant U.S. Attorney
Attorney for the United States

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

Dated: October 22, 2025


WILLIAM B. SHUBB
UNITED STATES DISTRICT JUDGE